

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

Andrew Yang, Jonathan Herzog, Hellen Suh, Brian Vogel,  
Shlomo Small, Alison Hwang, Kristen Medeiros and Dr.  
Roger Green, *individually and on behalf of all others similarly  
situated,*

*Plaintiffs,*

-and-

20-cv-03325 (AT)

George Albro, Jay Bellanca, Traci Strickland, Emily  
Adams, Nestor Medina, Simran Nanda, Kathryn Levy,  
Joshua Sauberman, Cari Gardner, Stephen Carpineta, Ting  
Barrow, Penny Mintz, and Nancy de Delva,

*Proposed Plaintiff-Intervenors,*

-against-

Douglass Kellner, *in his official capacity*, Andrew Spano, *in his  
official capacity*, and the New York State Board of Elections,  
*Defendants.*

**PLAINTIFF-INTERVENOR'S NOTICE  
OF MOTION FOR INJUNCTIVE RELIEF**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law dated May 1, 2020 in Support of Plaintiff-Intervenor's Motion for Intervention; Complaint in Intervention; Memorandum of Law dated May 1, 2020 in support of Plaintiffs' Emergency Application to Invalidate New York Election Law § 2-122-a (13) and Reinstate the New York Democratic Presidential Primary; and Exhibits referenced therein; and all of the prior pleadings and proceedings had herein, Plaintiff-Intervenors George Albro, Jay Bellanca, Traci Strickland, Emily Adams, Nestor Medina, Simran Nanda, Kathryn Levy, Joshua Sauberman, Cari Gardner, Stephen Carpineta, Ting Barrow, Penny Mintz, and Nancy de Delva , will move this Court, before the Honorable Analisa Torres, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007, on a date and time that is convenient for the Court, for an Order granting Plaintiff-Intervenor's request for an order directing

Defendants to reinstate the Presidential Primary, and restoring Intervenor-Plaintiffs to the ballot, on a date in June or July to be selected by this Court, and further directing that to protect voters from COVID-19, that all voting take place by mail-in ballot; and other relief requested in their annexed Complaint in Intervention.

DATED: May 1, 2020  
New York, NY

/s/

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Elena L. Cohen  
J. Remy Green  
Jonathan Wallace, of counsel  
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**ADVOCATES FOR JUSTICE**

*Attorneys for Proposed Plaintiff-Intervenors*